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18 **UNITED STATES DISTRICT COURT**
19 **NORTHERN DISTRICT OF CALIFORNIA**

20 JESSICA LEE, individually and on behalf of a
21 class of similarly situated individuals,

22 Plaintiff,

23 v.

24 STONEBRIDGE LIFE INSURANCE
25 COMPANY, a Vermont corporation, and
TRIFECTA MARKETING GROUP, LLC, a
26 Florida limited liability company,

27 Defendants.
28

Case No. CV 11-0043-RS

**STIPULATION AND ~~PROPOSED~~ ORDER
TO STAY DEADLINES**

Judge: Hon. Richard Seeborg
Magistrate: Hon. Jacqueline Scott Corley

1 Plaintiff Jessica Lee, Defendant Stonebridge Life Insurance Company (“Stonebridge”), and
2 Defendant Trifecta Marketing Group, LLC (“Trifecta”) (collectively referred to herein as the
3 “Parties”), by and through their respective counsel of record, hereby stipulate to vacate the pending
4 hearing dates and to stay this litigation, including all briefing and discovery obligations for a period
5 of sixty (60) days from the date this stipulation is approved to allow the Parties to prepare a new
6 Class Action Settlement Agreement that will, should it be approved by the Court, resolve all
7 pending claims of Plaintiff and the Class in this litigation. In support, the Parties state as follows:

8 WHEREAS, Plaintiff and Trifecta reached partial a class action settlement agreement and
9 Plaintiff’s Motion for Preliminary Approval is scheduled for hearing on December 12, 2013 (dkt.
10 143);

11 WHEREAS, on November 7, 2013, the Plaintiff and Stonebridge participated in a mediation
12 in San Francisco with the Honorable Rebecca Westerfield (ret.) of JAMS. Thereafter, Plaintiff and
13 Stonebridge reached a class action settlement in principle;

14 WHEREAS, there are several outstanding deadlines and hearings scheduled in this Action,
15 including a November 27, 2013 deadline to complete follow-up fact discovery (dkt. 141), a
16 November 22, 2013 deadline for Plaintiff to respond to Stonebridge’s Motion to Decertify the Class
17 (dkt. 144), outstanding discovery obligations for both Defendants and Plaintiff, and hearings on
18 Plaintiff’s Motion for Preliminary Approval of Partial Class Action Settlement and Stonebridge’s
19 Motion to Decertify the Class set for December 12, 2013, and December 19, 2013, respectively;

20 WHEREAS, Plaintiff will be withdrawing her Motion for Preliminary Approval of Partial
21 Class Action Settlement with Trifecta, and intends to file a revised Class Action Settlement
22 Agreement that will resolve all the claims of Plaintiff and the Class against both Stonebridge and
23 Trifecta within sixty (60) days;

24 WHEREAS, the Parties believe that a stay is warranted to conserve the resources of both the
25 Parties and the Court, and to allow the Parties to complete and execute a class action settlement
26 agreement and submit it to the Court for Preliminary Approval;

1 IT IS HEREBY STIPULATED AND AGREED by the Parties, through their counsel, that,
2 with the Court's agreement, this Action be stayed for a period of sixty (60) days, that all outstanding
3 discovery deadlines and responsive motion deadlines be stayed for 60 days, and that the December
4 12, 2013 and December 19, 2013 hearing dates be vacated. The Parties agree to submit a joint
5 status report on the day that this stay is scheduled to expire to inform the Court of the status of the
6 settlement, unless Plaintiff has moved for preliminary approval of a class action settlement
7 agreement on or before such time.

8
9 IT IS SO STIPULATED, THROUGH COUNSEL OF RECORD.

10
11 Dated: November 15, 2013

12 EDELSON LLC

13 By Ryan D. Andrews
14 RYAN D. ANDREWS
15 Attorney for
16 Plaintiff JESSICA LEE AND THE CLASS

17 Dated: November 15, 2013

18 MORRISON & FOERSTER, LLP

19 By Tiffany Cheung
20 TIFFANY CHEUNG
21 Attorney for
22 Defendant STONEBRIDGE LIFE INSURANCE
23 COMPANY


24 Dated: November 15, 2013

25 LAW OFFICES OF ALEXANDER SKLAVOS

26 By Alexander E. Sklavos
27 ALEXANDER E. SKLAVOS
28 Attorney for
Defendant TRIFECTA MARKETING GROUP, LLC

PURSUANT TO STIPULATION, IT IS SO ORDERED.

DATED: November 15 2013



RICHARD SEEBORG
UNITED STATES DISTRICT JUDGE